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Attorney for Debtor,  
Bistermu Mora Salgado

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF CALIFORNIA**

**In re**  
**Bistermu Mora Salgado,**  
**Debtor.**

**Bistermu Mora Salgado,**

**Movant,**  
**vs.**

**Lendify Financial, LLC,**

**Respondent.**

**Case No. 19-02556-LT7**

**Chapter: 7**

**Declaration of Stephan A. Hoover  
in Support of Debtor's Motion for  
Sanctions for Violations of the  
Automatic Stay and Discharge  
Injunction Against Lendify  
Financial, LLC a/k/a Aura  
Financial, LLC**

**Date: April 2, 2020**

**Time: 10:00 a.m.**

**Dept: 3, Room 129**

**Judge: Hon. Laura S. Taylor**

1 I, STEPHAN A. HOOVER, declare as follows:

2 1) I am an attorney and licensed to practice law in California and in this district  
3 court. I am an associate with the Law Office of Stephan A. Hoover ("SAH"),  
4 attorney for the debtor Bistermu Mora Salgado ("Debtor"). I am knowledgeable  
5 about the matters stated in this declaration and am competent to testify thereto.  
6 By making this declaration, I do not intend to waive attorney-client privilege.

7 2) To date, Debtor has incurred attorneys' fees and costs in pursuit of enforcement  
8 of the automatic stay and discharge in this case for the multiple hours spent by  
9 his attorneys working on this motion, order to show cause, and supporting  
10 pleadings. Debtor is represented by George Panagiotou and Stephan A. Hoover.  
11 Mr. Panagiotou's and Mr. Hoover's current billing rate is \$315.00 per hour.  
12 Mr. Panagiotou is an attorney working in bankruptcy and admitted to practice in  
13 California since 2009. The billing rate for Mr. Panagiotou is \$315.00 per hour  
14 and in this matter at the time this is drafted has spent multiple hours in  
15 consultation with the debtor and co-counsel in reasonable efforts to enforce the  
16 automatic stay and discharge injunction. Mr. Hoover is an attorney at Law  
17 Office of Stephan A. Hoover, working in consumer protection litigation and  
18 bankruptcy litigation and admitted to practice in California since 2014. Mr.  
19 Hoover is a member of the National Association of Consumer Bankruptcy  
20 Attorneys an organization of attorneys that advocates for consumers nationwide  
21 regarding bankruptcy matters and provides extensive training on consumer  
22 bankruptcy litigation. The current billing rate for Mr. Hoover is \$315.00 per  
23 hour, and in this matter at the time this is drafted has spent multiple hours in  
24 consultation with co-counsel and drafting these pleadings in reasonable efforts  
25 to enforce the automatic stay and discharge injunction. With regard to costs,  
26 these costs include the postage, service fees, research fees, etc. required for the  
27 litigation.

- 1 3) The rates charged by Mr. Panagiotou and Mr. Hoover are the same they charge  
2 in non-contingent matters.
- 3 4) I have provided a U.S. Consumer Law Attorney Fee Survey Report for 2013-2014,  
4 indicating that a fee rate of \$257-\$306 is average for a consumer attorney with  
5 one to five years' experience in Southern California (Los Angeles Metro Area  
6 specified). A true and correct copy of excerpts from the 2013-2014 U.S.  
7 Consumer Law Attorney Fee Survey Report is attached hereto as **Exhibit D** and  
8 incorporated herein by this reference.

9  
10  
11 I declare under penalty of perjury, pursuant to the law of the State of  
12 California and the United States, that the foregoing statements are true and correct  
13 to the best of my knowledge, information and belief. Executed this 8th day of  
14 February, 2020 in Carlsbad, California.

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18 **Law Office of Stephan A. Hoover**

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20 Date: February 8, 2020

By: /s/ Stephan A. Hoover

21 Stephan A. Hoover  
22 Attorney for Debtor  
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